

EXHIBIT A

Marie M. Jones

From: Marie M. Jones
Sent: Tuesday, June 13, 2023 10:32 AM
To: Catherine Smith; Chambers of Magistrate Judge Joseph F. Saporito
Cc: ggeiger_newmanwilliams.com; Lees, Paul; mwynkoop@margolisedelstein.com; Michael R. Lettrich; Alyssa DeBise; abaranowski@margolisedelstein.com; Jocelyn'; kbambary@dmclaw.com
Subject: Re: Jane Doe, et al. v. Schuylkill County et. al. (Civil Action No.: 3:21-00477)

Judge,

My clients and I very much appreciated your efforts. As you noted, the county remains willing to work with you on this matter, believing such discussions are not a waste of time.

Best,
Marie

Marie Milie Jones
JonesPassodelis, PLLC
www.jonespassodelis.com
412-315-7272

Sent from my iPhone

On Jun 13, 2023, at 10:15 AM, Catherine Smith <catherine@dereksmithlaw.com> wrote:

Your Honor,

At this time my clients feel that any additional efforts would be a waste of everyone's time. Should they change their minds we will surely let you know. Your time and effort on this matter is greatly appreciated.

Please let me know if you have any questions or concerns.

Thank you,
Catherine W. Lowry, Esq.

*Admitted PA & NJ,

DEREK SMITH LAW GROUP, PLLC

The Employment Lawyers™

Representing Employees Exclusively

Tel: (267) 857-0832 | Toll Free No. (800) 807-2209 | Email: catherine@dereksmithlaw.com

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From: Chambers of Magistrate Judge Joseph F. Saporito
<Magistrate_Judge_Saporito@pamd.uscourts.gov>
Sent: Tuesday, June 13, 2023 10:06 AM
To: Catherine Smith <catherine@dereksmithlaw.com>; Chambers of Magistrate Judge Joseph F. Saporito <Magistrate_Judge_Saporito@pamd.uscourts.gov>
Cc: mjones_jonespassodelis.com <mjones@jonespassodelis.com>; ggeiger_newmanwilliams.com <ggeiger@newmanwilliams.com>; Lees, Paul <plees@dmclaw.com>; mwynkoop@margolisedelstein.com <mwynkoop@margolisedelstein.com>; mjones_jonespassodelis.com <mjones@jonespassodelis.com>; Michael R. Lettrich <mlettrich@jonespassodelis.com>; Alyssa DeBise <alyssa@dereksmithlaw.com>; abaranowski@margolisedelstein.com <abaranowski@margolisedelstein.com>; Jocelyn' <jmendez@margolisedelstein.com>; kbambary@dmclaw.com <kbambary@dmclaw.com>
Subject: RE: Jane Doe, et al. v. Schuylkill County et. al. (Civil Action No.: 3:21-00477)

Dear Ms. Lowry:

It is unfortunate that your clients have shut down settlement negotiations. It was evident to me that the defendants were willing to give the case another attempt to settle. If your clients have a desire to resume discussions in the future (assuming the defendants do as well), I am willing to remain involved.

Thank you,



Joseph F. Saporito, Jr.
Joseph F. Saporito, Jr., U.S. Magistrate Judge
United States District Court for the
Middle District of Pennsylvania
197 South Main Street, Suite 161
Wilkes-Barre, PA 18701
(570) 831-2570

From: Catherine Smith <catherine@dereksmithlaw.com>
Sent: Monday, June 12, 2023 6:21 PM
To: Chambers of Magistrate Judge Joseph F. Saporito
<Magistrate_Judge_Saporito@pamd.uscourts.gov>
Cc: mjones_jonespassodelis.com <mjones@jonespassodelis.com>; ggeiger_newmanwilliams.com <ggeiger@newmanwilliams.com>; Lees, Paul <plees@dmclaw.com>; mwynkoop@margolisedelstein.com; mjones_jonespassodelis.com <mjones@jonespassodelis.com>; Michael R. Lettrich <mlettrich@jonespassodelis.com>; Alyssa DeBise <alyssa@dereksmithlaw.com>; abaranowski@margolisedelstein.com; Jocelyn' <jmendez@margolisedelstein.com>; kbambary@dmclaw.com
Subject: Jane Doe, et al. v. Schuylkill County et. al. (Civil Action No.: 3:21-00477)

CAUTION - EXTERNAL:

Good Evening,

My clients have advised me that they are no longer interested in pursuing settlement discussions with His Honor. As such, I do not believe that this Thursday's 3 PM teleconference is necessary.

Please let me know if you or His Honor have any questions or concerns.

Thank you,

Catherine W. Lowry, Esq.

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Marie M. Jones

From: Catherine Smith <catherine@dereksmithlaw.com>
Sent: Wednesday, June 14, 2023 3:17 PM
To: Gerard Geiger
Cc: Marie M. Jones; Lees, Paul; mwynkoop@margolisedelstein.com; Michael R. Lettrich; Alyssa DeBise; abaranowski@margolisedelstein.com; Jocelyn'; kbambary@dmclaw.com
Subject: Re: Jane Doe, et al. v. Schuylkill County et. al. (Civil Action No.: 3:21-00477)

Counsel,

My clients have all instructed me to withdraw from negotiations with Judge Saporito. However, as I informed Marie, negotiations may still be possible. We have suggested Magistrate Judge Melhachick. I am awaiting Marie update regarding her clients' position to that proposal.

Please let me know if you have any questions or concerns.

Thank you,

Catherine W. Lowry, Esq.

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From: Gerard Geiger <ggeiger@newmanwilliams.com>

Sent: Wednesday, June 14, 2023 2:50 PM

To: 'Chambers of Magistrate Judge Joseph F. Saporito' <Magistrate_Judge_Saporito@pamd.uscourts.gov>; Catherine Smith <catherine@dereksmithlaw.com>

Cc: mjones_jonespassodelis.com <mjones@jonespassodelis.com>; Lees, Paul <plees@dmclaw.com>; mwynkoop@margolisedelstein.com <mwynkoop@margolisedelstein.com>; mjones_jonespassodelis.com <mjones@jonespassodelis.com>; Michael R. Lettrich <mlettrich@jonespassodelis.com>; Alyssa DeBise <alyssa@dereksmithlaw.com>; abaranowski@margolisedelstein.com <abaranowski@margolisedelstein.com>; Jocelyn' <jmendez@margolisedelstein.com>; kbambary@dmclaw.com <kbambary@dmclaw.com>

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My comments are somewhat late, but I was out of the office.

In an emotional case such as this one, I understand how some of the parties might reject further mediation efforts. And, it goes without saying that I represent the target of the plaintiffs' claims, George Halcovage.

I encourage the plaintiffs to continue the process. Even if mediation could narrow some issues to be tried, it would be useful. It is not all or nothing. And, if we try the case, maybe the trial will be shorter.

Catherine: Let's continue discussions. Even if only to narrow the issues. You have 4 plaintiffs who have completely different damages claims. Say "yes" and I'll ask Judge Saporito for a conference call.

And to Judge Saporito: thanks for your efforts.

Jerry Geiger



Gerard J. Geiger, Esq.
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